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By Electronic Filing

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W., Suite TW-A325
Washington, D.C. 20554

RE: EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to Section 64.2009(e) of the Commission's rules, 47 C.F.R. § 64.2009(e), Windstream Corporation hereby submits the annual CPNI Certification for 2009 for its affiliates listed in "Attachment A" of the attached document.

Please feel free to contact me if you require additional information.

Respectfully submitted,

/s/ Stacy J. Majors

Stacy J. Majors

Encl.

cc: Best Copy and Printing, Inc.

Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for **2009**

Date filed: February 25, 2010

Name of company(s) covered by this certification: **Windstream Corporation's affiliates.**
Please see Attachment A for a list of the companies covered by this certification.

Form 499 Filer ID: **Please see Attachment A for a list of the Form 499 Filer IDs assigned to each company.**

Name of Signatory: **Richard Crane**

Title of Signatory: **Executive Vice President – Chief Marketing Officer**

I, Richard Crane, certify that I am an officer of the companies named above, and acting as an agent of those companies, that I have personal knowledge that the companies have established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the companies' procedures ensure that the companies are in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules. The companies include the following ones which were acquired by Windstream during 2009 and therefore are included in this certification:

- D&E Networks, Inc.
- D&E Systems, Inc., now known as Windstream D&E Systems, Inc.
- Conestoga Telephone and Telegraph Company, now known as Windstream Conestoga, Inc.
- Buffalo Valley Telephone Company, now known as Windstream Buffalo Valley, Inc.
- Denver and Ephrata Telephone and Telegraph Company, now known as Windstream D&E, Inc.
- The Lexcom Telephone Company, now known as Windstream Lexcom Communications, Inc.
- Lexcom Cable Service, LLC, now known as Windstream Lexcom Entertainment, LLC
- Lexcom Long Distance, LLC, now known as Windstream Lexcom Long Distance, LLC
- Lexcom Wireless Services, LLC, now known as Windstream Lexcom Wireless, LLC

The companies have not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. Companies must report on any information that they have with respect to the processes pretexters are using to attempt to access CPNI, and what step companies are taking to protect CPNI.

The companies have not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may be subject to enforcement action.


Signed:  _____

Exhibit 1

WINDSTREAM CORPORATION AND ITS AFFILIATES

STATEMENT EXPLAINING HOW WINDSTREAM'S OPERATING PROCEDURES ENSURE COMPLIANCE WITH THE FCC'S CPNI RULES

I. STATEMENT OF WINDSTREAM'S CPNI POLICY AND PRACTICES

Customer Proprietary Network Information ("CPNI") is defined in Section 222(h) of the Communications Act of 1934, as amended (the "Act") as (A) information that relates to the quantity, technical configuration, type, destination, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier, and that is made available to the carrier by the customer solely by virtue of the carrier-customer relations; and (B) information contained in the bills pertaining to telephone exchange service or telephone toll service received by a customer of a carrier (except that CPNI does not include subscriber list information).

Generally, CPNI includes personal information regarding a customer's use of his or her telecommunications services. CPNI encompasses information such as: (a) the telephone numbers called by a consumer; (b) the telephone numbers calling a customer; (c) the time, location and duration of a consumer's outbound and inbound phone calls; and (d) the telecommunications services purchased by a consumer.

Call detail information (also known as "call records") is a category of CPNI that is particularly sensitive from a privacy standpoint and that is sought by pretexters, hackers and other unauthorized entities for illegitimate purposes. Call detail includes any information that pertains to the transmission of a specific telephone call, including the number called (for outbound calls), the number from which the call was placed (for inbound calls), and the date, time, location and/or duration of the call (for all calls).

The policy of Windstream Corporation and its affiliates (collectively, "Windstream" or the "Company") is to comply with the letter and spirit of all CPNI laws and implementing rules. The principal procedures utilized by Windstream to comply with laws and rules pertaining to CPNI contained in the Act and the FCC's rules at 47 C.F.R. Part 64 Subpart U (the "FCC Rules"), are documented below.

The FCC's regulations require Windstream to:

- Implement a system to clearly establish the status of a customer's CPNI approval prior to the use of CPNI. Windstream has done so.
- Train its personnel as to when they are, and are not, authorized to use CPNI. Windstream has implemented such a training program for all employees.
- Have an express disciplinary process in place for violation of Windstream's CPNI policies and procedures. Windstream has implemented such a disciplinary process.

All employees of Windstream are required to follow the policies, procedures and practices specified herein.

II. USE OF CPNI IN GENERAL

Except as otherwise described herein, when Windstream receives or obtains CPNI by virtue of its provision of a telecommunications service, it may only use, disclose or permit access to individually identifiable CPNI in its provision of:

1. The telecommunications service from which the information is derived; or
2. Services necessary to, or used in, the provision of the telecommunications service, including the publishing of directories; and for purposes described in Section III.E below.

III. GUIDELINES FOR USE AND RELEASE OF CPNI

A. Windstream uses, discloses and/or permits authorized employee access to CPNI in connection with Company-initiated marketing of services to which a customer does not already subscribe from the Company (out-bound marketing) only pursuant to the notice and approval procedures set forth in Sections 64.2007, 64.2008 and 64.2009 of the FCC's Rules. All proposed out-bound marketing activities are reviewed by Company supervisory officials for compliance with the CPNI restrictions and requirements in the Act and the FCC Rules.

B. Unless a customer has opted-out from the use of their CPNI, Windstream may use or permit authorized employee access to CPNI to market service offerings to which the customer does not already subscribe from Windstream.

C. Windstream employees, agents, independent contractors and joint venture partners may **NOT** use CPNI to identify or track customers who have made calls to, or received calls from, competing carriers. Nor may the Company's employees, agents, independent contractors or joint venture partners use or disclose CPNI for any purpose beyond the scope of their employment or contractual responsibilities.

D. Without prior customer approval, Windstream may use, disclose or permit authorized employee access to CPNI for the purpose of providing or marketing service offerings within the same categories of service to which the customer already subscribes from Windstream.

E. Windstream may use, disclose or permit access to CPNI, without customer approval, as described below:

1. To provide inside wiring installation, maintenance, and repair services.
2. To market services formerly known as adjunct-to-basic services, such as, but not limited to, speed dialing, computer-provided directory assistance, call monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller I.D., call forwarding and Centrex features.

3. For the provision of customer premises equipment and call answering, voice mail or messaging, voice storage and retrieval services, fax store and forward, and protocol conversion.
4. To protect the rights or property of the carrier, or to protect users of those services and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, such services.
5. To initiate, render, bill and collect for communications services.
6. To provide call location information regarding mobile users in certain emergency situations (may be used by Company's wireless affiliates and authorized employees).
7. As otherwise required by law, for example, pursuant to a valid subpoena.

F. Since December 8, 2007, Windstream discloses or releases call detail information to customers as a result of customer-initiated telephone contacts only by sending a copy of such information to the customer's address of record. If during a customer-initiated telephone call the customer is able to provide to the company all of the call detail information necessary to address a specific customer service issue (*i.e.*, the telephone number called, when it was called, and, if applicable, the amount charged for the call) without company assistance, then the Company may take routine customer service actions related to such information. However, under this circumstance, the Company may not disclose to the customer any call detail information about the customer account other than the call detail information that the customer provides.

G. Since December 8, 2007, the Company notifies customers immediately of certain changes in their accounts that may affect privacy or security matters as required in Section 64.2010(f) of the FCC's Rules.

H. Since December 8, 2007, the Company will provide an initial notice to law enforcement and a subsequent notice to the customer if a security breach results in the disclosure of the customer's CPNI to a third party without the customer's authorization. As soon as practicable (and in no event more than seven (7) days) after the Company discovers that a person (without authorization or exceeding authorization) has intentionally gained access to, used or disclosed CPNI, the Company will provide electronic notification of such breach to the United States Secret Service and to the Federal Bureau of Investigation via a central reporting facility accessed through a link maintained by the FCC at <http://www.fcc.gov/eb/cpni>. Records of such unauthorized access and notifications will be maintained for at least two (2) years.

I. Since December 8, 2007, the Company provides customers with access to CPNI at its retail locations if the customer presents a valid photo ID and the valid photo ID matches the name on the account.

J. Since December 8, 2007, the Company takes reasonable measures to discover and protect against activity that is indicative of pretexting and other unauthorized access to CPNI.

IV. OBTAINING CUSTOMER APPROVAL FOR USE OF CPNI

A. Soliciting Customer Approval

Because Windstream desires to use CPNI for the purpose of marketing services and products to its customers outside the scope of their total services, Windstream obtains approval to use CPNI through written, oral or electronic methods.

1. If Windstream relies on an oral approach, it bears the burden of demonstrating that such approval has been given in compliance with the FCC's regulations.
2. A customer's approval or disapproval to use, disclose, or permit access to CPNI remains in effect until the customer revokes or limits such approval or disapproval.

B. Use of Opt-Out and Opt-In Approval Processes

1. Windstream utilizes the opt-out method in obtaining approval to use a customer's individually identifiable CPNI for the purpose of marketing communications-related services outside the category to which the customer already subscribes.

2. In order for Windstream to disclose its customers' individually identifiable CPNI, for the purpose of marketing communications-related services, to agents, joint venture partners and independent contractors, Windstream utilizes the opt-in method to obtain approval.

3. If Windstream discloses or provides access to CPNI to a joint venture partner or independent contractor, in addition to obtaining opt-in customer approval, it enters into confidentiality agreements with such contractors or partners. The confidentiality agreement at a minimum:

- i. Requires that the independent contractor or joint venture partner use the CPNI only for the purpose of marketing or providing the communications-related services for which Windstream has provided the CPNI;
- ii. Disallows the independent contractor or joint venture partner from using, allowing access to, or disclosing the CPNI to any party, unless required to make such disclosure under force of law; and
- iii. Requires that the independent contractor or joint venture partner have appropriate protections in place to ensure the ongoing confidentiality of consumers' CPNI.

V. NOTICES REQUIRED FOR USE OF CPNI

A. Mandatory Notices Regarding Solicitation

1. Prior to soliciting any customer approval to use, disclose, or permit access to customers' CPNI, Windstream notifies the customer of the customer's right to restrict use of, disclosure of, and access to the customer's CPNI.

2. Windstream maintains records of the notification and any subsequent approval, whether oral, written or electronic, for at least one (1) year.

3. Content of Notice: Customer notification provides sufficient information to enable the customer to make an informed decision whether to permit Windstream to use, disclose or permit access to the customer's CPNI. The notification:

- i. States that the customer has a right, and Windstream has a duty, under federal law, to protect the confidentiality of CPNI.
- ii. Specifies the types of information that constitute CPNI and the entities that will receive the CPNI, describes the purposes for which CPNI will be used, and

- iv. Windstream does not have to disclose precise steps a customer must take in order to grant or deny access to CPNI, as long as the customer can deny access to his CPNI for the call.

VI. COMPANY SAFEGUARDS AND RECORDKEEPING REQUIREMENTS

In addition to the safeguards and recordkeeping requirements described above, Windstream employs the following safeguards and practices for purposes of compliance with Section 64.2009 of the FCC Rules:

A. Management Safeguards

1. Training of Company personnel includes a review of Windstream's CPNI Computer-Based Training module by all new employees and all existing employees who have not previously done so.
2. Windstream provides additional training on an as-needed basis.
3. Company personnel makes no decisions regarding use of CPNI not authorized by Windstream's policy as reflected in this Statement of Compliance without first consulting one of the following:
Director - Campaign Management
Staff Manager – Regulatory Counsel
Privacy Committee
4. In deciding whether the contemplated use of CPNI is proper, the individual(s) listed in the previous paragraph consult Windstream policy, applicable FCC regulations and, if necessary, legal counsel.
5. Any improper use of CPNI results in disciplinary action in accordance with established Company disciplinary policies. Any improper use may result in suspension or termination of employment in appropriate cases.
6. Windstream will provide written notice within five (5) business days to the FCC of any instance where the opt-out mechanisms do not work properly, to such a degree that consumers' inability to opt-out is more than an anomaly.
 - i. The notice will be in the form of a letter, and will include Windstream's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
 - ii. Windstream must submit the notice even if Windstream offers other methods by which consumers may opt-out.
7. On an annual basis, a corporate officer of Windstream signs a compliance certificate stating that the officer has personal knowledge that Windstream has established operating procedures that are adequate to ensure compliance with the FCC's Rules, and submit the certification and other information required under Section 64.2009(e) of the FCC Rules concerning actions (if any) taken against pretexters, customer complaints (if any) and pretexters' activities.
8. Windstream's Privacy Committee reviews these procedures on a continuing basis to ensure compliance with all FCC Rules and other privacy laws and rules, and revises these procedures as needed to reflect any subsequent revisions to the applicable rules addressing CPNI.

B. Recordkeeping

1. Windstream maintains records of its own sales and marketing campaigns that use CPNI in files clearly identified as such. These records include a description of each campaign, the specific CPNI that was used in the campaign, and the products and services that were offered as a part of the campaign. Windstream will maintain these records in its offices for a minimum of one (1) year.
2. Windstream maintains records of its third-party agents' sales and marketing campaigns that use CPNI in files clearly identified as such. These records will include a description of each campaign, and the products and services that were offered as a part of the campaign. Windstream will maintain these records in its office for a minimum of one (1) year.
3. Windstream maintains separate files in which it will retain any court orders respecting CPNI.

VII. ACTIONS TAKEN AGAINST DATA BROKERS

Windstream took no action against data brokers in 2009.

VIII. SUMMARY OF CUSTOMER COMPLAINTS

Windstream received no customer complaints regarding use of CPNI in 2009.

ATTACHMENT A

Form 499

Filer ID	Legal Entity Name
804682	D&E Networks, Inc.
805083	Windstream Arkansas, LLC
808110	Windstream Buffalo Valley, Inc., f/k/a Buffalo Valley Telephone Company
807705	Windstream Communications Kerrville, LLC
821094	Windstream Communications Telecom, LLC
825732	Windstream Communications, Inc.
802581	Windstream Conestoga, Inc., f/k/a Conestoga Telephone and Telegraph Company
804681	Windstream D&E, Inc., f/k/a Denver and Ephrata Telephone and Telegraph Company
820376	Windstream D&E Systems, Inc., f/k/a D&E Systems, Inc.
805080	Windstream Florida, Inc.
805102	Windstream Georgia Communications, LLC
808203	Windstream Georgia Telephone, LLC
805062	Windstream Georgia, LLC
822508	Windstream Kentucky East, LLC
805149	Windstream Kentucky West, LLC
812933	Windstream Kerrville Long Distance, LLC
801714	Windstream Lexcom Communications, Inc., f/k/a The Lexcom Telephone Company
826491	Windstream Lexcom Entertainment, LLC, f/k/a Lexcom Cable Service, LLC
801717	Windstream Lexcom Long Distance, LLC, f/k/a Lexcom Long Distance, LLC
821876	Windstream Lexcom Wireless, LLC, f/k/a Lexcom Wireless Services, LLC
805122	Windstream Mississippi, LLC
805044	Windstream Missouri, Inc.
802434	Windstream Nebraska, Inc.
805074	Windstream New York, Inc.
805089	Windstream North Carolina, LLC
802036	Windstream of the Midwest, Inc.
805086	Windstream Ohio, Inc.
805134	Windstream Oklahoma, LLC
805092	Windstream Pennsylvania, LLC
805059	Windstream South Carolina, LLC
821878	Windstream Southwest Long Distance, LP
809320	Windstream Standard, LLC
805077	Windstream Sugar Land, Inc.
802035	Windstream Systems of the Midwest, Inc.

ATTACHMENT A (continued)**Form 499**

Filer ID	Legal Entity Name
805095	Windstream Western Reserve, Inc.
808467	Windstream Concord Telephone, Inc.
804615	Windstream Accucomm Telecommunications, LLC
805033	Oklahoma Windstream, LLC
805035	Windstream Alabama, LLC
805105	Georgia Windstream, Inc.
805140	Texas Windstream, Inc.
820011	Valor Telecommunications of Texas, LP